

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: STEPHEN TODD WALKER Debtor	Case No. 20-13557-elf
BANK OF AMERICA, N.A. Movant	Chapter 11
vs. STEPHEN TODD WALKER Respondents	11 U.S.C. §362

**MOTION FOR RELIEF FROM AUTOMATIC STAY UNDER §362 PURSUANT TO
BANKRUPTCY PROCEDURE RULE 4001**

Movant, by its attorneys, Brock and Scott PLLC, hereby requests a termination of Automatic Stay and leave to foreclose on its mortgage on real property owned by Stephen Todd Walker.

1. Movant is Bank of America, N.A.
2. Debtor, Stephen Todd Walker, is the owner of the premises located at 611 ROSE LANE, BRYN MAWR, PENNSYLVANIA 19010 hereinafter known as the mortgaged premises.
3. Movant is the holder of a mortgage on the mortgaged premises.
4. As of January 3, 2022, the principal balance owed on the loan is \$484,244.70.
5. As of January 3, 2022, interest in the amount of \$10,750.67, has accrued since the application of the last payment received from the Debtor.
6. In addition, the following charges, fees and costs have been added to the balance of the loan and are due and owing to Movant: Accrued Late Charges in the amount of \$8,596.17, Escrow Advances in the amount of \$69,415.85, and Suspense Balance in the amount of \$3,522.04.
7. As of January 3, 2022, the payoff due on the mortgage is \$569,485.35.
8. The following chart sets forth the number and amount of payments due pursuant to the terms of the Note that have been missed as of January 3, 2022:

Number of Missed Payments	From	To	Monthly Payment Amount	Total Amounts Delinquent
4	10/01/2021	01/01/2022	\$7,847.41	\$31,389.64
Less post-petition partial payments (suspense balance): \$731.17				Total: <u>\$30,658.47</u>

9. The next payment is due on or before February 1, 2022 in the amount of 7,847.41. Under the terms of the Note and Mortgage, Debtor has a continuing obligation to remain current post-petition and failure to do so results in a lack of adequate protection to Movant,

10. As of January 3, 2022, the amount necessary to reinstate the loan is \$30,658.47.

11. Movant has cause to have the Automatic Stay terminated as to permit Movant to complete foreclosure on its mortgage.

12. Movant specifically requests permission from the Honorable Court to communicate with Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

13. Respondent, Furtek & Associates, LLC. SUBCHAPTER V TRUSTEE, is the Trustee appointed by the Honorable Court.

14. If the debtor has been negatively impacted by COVID-19, the debtor may contact Wells Fargo Home Mortgage to discuss a personalized solution at 1-800-274-7025. Written attorney consent may be required to speak directly with the debtor about these options.

WHEREFORE, Movant respectfully requests that this Court enter an Order;

a. Modifying the Automatic Stay under Section 362 respect to 611 ROSE LANE, BRYN MAWR, PENNSYLVANIA 19010 (as more fully set forth in the legal description attached to the Mortgage of record granted against the Premises), as to allow Movant, its successors or assignees, to proceed with its rights under the terms of said Mortgage; and

b. Movant specifically requests permission from this Honorable Court to communicate with Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law; and

c. Granting any other relief that this Court deems equitable and just.

January 17, 2022

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

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